

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ORIGINAL  
FILED  
MAR 23 2018  
SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SHAHRIAR JABBARI and KAYLEE )  
HEFFELFINGER, on behalf of themselves )  
And all others similarly situated, )

Plaintiffs, )

v. )  
WELLS FARGO & COMPANY AND )  
WELLS FARGO BANK, N.A., )

Defendants. )

Case No. 3:15-cv-02159-VC

**OBJECTION FOR DEFENDANTS TO  
PROCEED DUE TO THEIR FRAUD ON  
THE COURT**

**VICTIM MOTION TO OBJECT FOR DEFENDANTS TO PROCEED DUE TO FRAUD ON THE COURT  
BY DEFENDANTS AND TO EXTEND CLAIMS AVAILABLE TO THE YEAR 1997**

COMES NOW, JULIET COTTON, pro se, a Victim and Minority Female, files this her, Victim's Motion Objection For Defendants To Proceed Due To Their Fraud On The Court And To Compel Defendants To Claims Available To The Year 1997, since she has been denied the opportunity to have my claim involved in a court of law, or in this lawsuit, due to the enormous loss caused by the Defendants, because the Defendants have knowingly withheld from this Honorable Court that the practice of opening accounts did not end at the year 2000, and as if it only happened to individuals.

1.

The Defendants targeted Ms. Cotton and opened two unauthorized investment accounts in her company's name because she was a minority owned business, and African-American female, with seventy-six (76%) of the majority outstanding shares (9,120,000) in the company.

2.

Ms. Cotton was racially discriminated by the Defendants to file a claim because she is an African-American and black and a female.

3.

The Defendants claim was false when they stated their practice of opening unauthorized accounts only went back to the year 2000.

4.

The Defendants were aware that Ms. Cotton had two unauthorized investment accounts opened in her and her company's name that dated back to August 1, 1997 to November 28, 1997.

5.

The Defendants bought out Wachovia Bank NA, and Wachovia Bank.

6.

The Defendants opened two investment accounts, without Ms. Cotton's knowledge or authorization, from the period August 1, 1997 to November 28, 1997, when they invested her and her company's **\$12,000,000.00 (Twelve Million Dollars)** into the stock market **without her knowledge and authorization.**

7.

The Defendants opened unauthorized investment account number **14600012** for the period of August 1, 1997 through August 28, 1997 and ran it through SouthTrust Securities.

8.

The Defendants opened unauthorized investment account number **14610110** for the period of September 9, 1997 through November 28, 1997 and ran it through SouthTrust Securities.

9.

The Defendants withheld from this Honorable Court and other government agencies, the very fact that they knew their practices of opening unauthorized accounts did **not** end in 2000, and not just for personal accounts.

10.

The Defendants, have caused great harm, financial loss, inter alia, to Ms. Cotton when they opened the two investment accounts identified herein without her knowledge or authorization.

11.

The Defendants opened two investment accounts, without Ms. Cotton's knowledge or authorization, from the period August 1, 1997 to November 28, 1997, when they invested her and her company's **\$12,000,000.00 (Twelve Million Dollars)** into the stock market **without her knowledge and authorization.**

12.

The Defendants, knowingly subjected Ms. Cotton's \$12-million dollars to Investment Risk as well as the risk of Possible Loss of the Principal Amount invested, through SouthTrust Securities, as shown in the Account Statement below:

# **SouthTrust Securities**

P.O. Box 2554  
BIRMINGHAM, AL 35290

QUALITY GRAIN CO (GHANA) LTD  
ATTN J R WOODARD  
2022 POWERS FERRY RD  
SUITE 180  
ATLANTA GA 30339

PERIOD	PAGE
08/08/97-08/29/97	1
SOC SEC TAX ID	ACCT NO
	14600012

OFFICE	A/E
110	0944

YOUR REPRESENTATIVE: DAVID P. KANNE

404-853-5604

## **COMBINED CASH SUMMARY**

DESCRIPTION	AMOUNTS PAID	AMOUNTS RECEIVED	BALANCE
BALANCE FROM PREV STATEMENT			.00
AMOUNTS CREDITED DUE TO:			
SALES		11,782,000.00	
DEPOSITS		15,422,415.45	
AMOUNTS PAID DUE TO:			
PURCHASES	11,769,995.45		
CASH WITHDRAWALS	15,434,420.00		
ENDING BALANCE	27,204,415.45	27,204,415.45	.00

## **DAILY ACCOUNT ACTIVITY**

DATE	ACTIVITY	QUANTITY	DESCRIPTION	PRICE	AMOUNT	BALANCE
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13.

The Defendants **opened two investment accounts, without Ms. Cotton's knowledge or authorization**, from the period **August 1, 1997 to November 28, 1997**, where they invested my company's **\$12,000,000.00 (Twelve Million Dollars)** into the stock market **without my knowledge and authorization**, whereby the Defendants, knowingly subjected the \$12-million dollars to Investment Risk as well as the risk of Possible Loss of the Principal Amount invested.

The below is part of the first page of Account Statement for unauthorized account 14600012, where the Defendants invested Ms. Cotton's \$12 million dollars, as exhibit 1 in globo:

### SouthTrust Securities

P.O. Box 2554  
BIRMINGHAM, AL 35290

QUALITY GRAIN CO (GHANA) LTD  
ATTN J R WOODARD  
2022 POWERS FERRY RD  
SUITE 180  
ATLANTA GA 30339

PERIOD	PAGE
08/08/97-08/29/97	1
SEC. REG. TAX. ID	ACCT. NO.
	14600012
OFFICE	A/E
11D	0944

YOUR REPRESENTATIVE: DAVID P. KANNE

404-853-5604

#### COMBINED CASH SUMMARY

DESCRIPTION	AMOUNTS PAID	AMOUNTS RECEIVED	BALANCE
BALANCE FROM PREV STATEMENT			.00
AMOUNTS CREDITED DUE TO:			
SALES		11,762,000.00	
DEPOSITS		15,422,415.45	
AMOUNTS PAID DUE TO:			
PURCHASES	11,769,995.45		
CASH WITHDRAWALS	15,434,420.00		
ENDING BALANCE	27,204,415.45	27,204,415.45	.00

#### DAILY ACCOUNT ACTIVITY

DATE	ACTIVITY	QUANTITY	DESCRIPTION	PRICE	AMOUNT	BALANCE
			OPENING ACCOUNT BALANCE			0.00
			PURCHASES AND SALES			
8/08/97	BUY	11,782,000	GENERAL ELECTRIC CAP CORP DISCOUNT COMMERCIAL PAPER 08/15/97	99.8981111	11,769,995.45DR	
8/15/97	SELL	11,782,000	GENERAL ELECTRIC CAP CORP DISCOUNT COMMERCIAL PAPER 08/15/97	100.0	11,782,000.00CR	
			DEPOSITS AND WITHDRAWALS			
8/08/97	CASH RECEIPT		80-023-531		11,769,995.45CR	
8/15/97	TEFRA WITHHOLD		SLS TEFRA WHD TID		3,652,420.00DR	
8/15/97	JOURNAL ENTRY		REV TEFRA W/H		3,652,420.00CR	
8/15/97	DISBURSEMENT		80-023-531		11,782,000.00DR	
			CLOSING ACCOUNT BALANCE			0.00

THESE INVESTMENTS ARE NOT INSURED BY THE FDIC; THEY ARE NOT A DEPOSIT OR OBLIGATION OF, ENDORSED BY, OR GUARANTEED IN ANY WAY BY ANY BANK OR ANY BANK SUBSIDIARY; AND THEY ARE SUBJECT TO INVESTMENT RISK, INCLUDING THE POSSIBLE LOSS OF THE PRINCIPAL AMOUNT INVESTED.

END OF STATEMENT

01368

ACCOUNT CARRIED WITH  
BHC SECURITIES, INC.  
MEMBER NEW YORK STOCK EXCHANGE

SIP

15.

The Defendants knew their scheme and artifice did not end in 2000, because Ms. Cotton submitted the below Account Statements as well as Sworn testimony, from the Defendants' employee, William (Bill) Browning, Senior Vice President of International Operations, who admitted Ms. Cotton was correct and did not authorize the investment account to be opened, and to close it and not open it again.

16.

Ms. Cotton submitted in a detailed letter to the Defendants' attorneys, former Chief Executive Officer, Mr. John G. Stumpf, and Mr. Timothy Sloan, CEO, for the Defendants, which was sent via certified and U.S. Postal Service Priority Mail service with tracking number that verified it was received. In addition, evidence that the opening of the two unauthorized accounts went to other employees of the Defendants.

17.

The Account Statement for the **August 8, 1997 -August 29, 1997**, clearly stated at the bottom of the page, "showed the Defendants knew accounts were opened past the year 2000

18.

The Defendants Account Statements where they invested Ms. Cotton's \$12 million through SouthTrust Securities stated, **"THESE INVESTMENTS ARE NOT INSURED BY THE FDIC; THEY ARE NOT A DEPOSIT OR OBLIGATION OF, ENDORSED BY, OR GUARANTEED IN ANY WAY BY ANY BANK OR ANY BANK SUBSIDIARY; AND THEY ARE SUBJECT TO INVESTMENT RISK, INCLUDING THE POSSIBLE LOSS OF THE PRINCIPAL AMOUNT INVESTED."**

The below is a transcript (**exhibit 2 *in globo***) of the testimony of the Defendants' employee **William (Bill) Browning** where he testified that his bank was using Ms. Cotton's \$12 million dollars, and she was correct that she did not give him authorization, and she told him to close the unauthorized investment account after three (3) weeks when she found out about it. Browning closed the unauthorized account number 14600012, for the period of August 8, 1997 -August 29, 1997. Yet, he and his accomplices, Ramechia Banks, and David Kanne of SouthTrust Securities, opened a different unauthorized investment account with account number 14610110 for the period of September 9, 1997 through November 28, 1997.

15       Q     Okay. Whose permission did you have to get to put  
16 the monies in a -- in those securities? Wasn't that money --  
17 Once the loan was done, Mr. Browning --

18       A     Yes.

19       Q     -- wasn't those monies for the exclusive use of  
20 Quality Grain -- wasn't it -- it was supposed to have been in  
21 an account, but your company was not supposed to trade that  
22 money through any papers, like General Electric, without the  
23 company's permission, the Ghana company; is that correct?

24       A     Well, I think that adds a brand new level of  
25 complexity to it. But I think what -- I think you are correct

The below is the testimony of William (Bill) Browning, in a civil action in Georgia, where he admitted Ms. Cotton was correct, that he had no permission to put our money into an investment account. The \$12 million dollars was to be used only to collateralize the Letter of Credits (LC) to purchase service, and goods for the commercial rice mill and farm project:

**Transcript page 777, lines 15-25:**

Q. Okay. Whose permission did you have to get to put the monies in a—in those securities? Wasn't that money—Once the loan was done, Mr. Browning—

A. Yes.

Q. --wasn't those monies for the exclusive use of Quality Grain—wasn't it—it was supposed to have been in an account, **but your company was not supposed to trade that money through any papers, like General Electric, without the company's permission, the Ghana company; is that correct?**

A. " Well, I think that adds a brand new level of complexity to it. **But I think what—I think you are correct**

**Page 777, lines 1-25:**

**Browning continued:** that we put this into an investment account with the intention that as long as it was going to be cash collateral it should actually be earning some additional money for the project.

Q. Yes, go on.

A. And some of the letters of credit actually didn't - - Some of the letters of credit didn't mature until three or four months down the line. ***And when you've got \$12 million in an investment account, your desire is to get several more dollars of income, because the collateral is being parked.***

**Now, it was upon your instruction, after about three weeks, because you did not want the funds to remain in the investment account, because you felt that the – the very fact that these were in short-term investments, that there could have been loss, devaluation loss to those - -**

***Although I tried to explain at the time, we issued the letters of credit - - if we issued letters of credit for \$100 and those letters of credit were already issued and our cash collateral diminished, that was going to be the bank's problem, not yours. Because we were using that - - and we had put them there in an effort to earn additional funds for you.***

**But you elected after about three weeks that it would be best simply to be put into a - - just a simple blocked account, no interest, no additional earning, and that account simply be debited as payments came in under letters of credit."**



Transcript page 777, lines 15-25:

11                Now, it was upon your instruction, after about three  
12 weeks, because you did not want the funds to remain in the  
13 investment account, because you felt that the -- the very fact  
14 that these were in short-term investments, that there could  
15 have been loss, devaluation loss to those --

16                Although I tried to explain at the time, we issued  
17 the letters of credit -- if we issued letters of credit for  
18 \$100 and those letters of credit were already issued and our  
19 cash collateral diminished, that was going to be the bank's  
20 problem, not yours. Because we were using that -- and we had  
21 put them there in an effort to earn additional funds for you.

22                But you elected after about three weeks that it would  
23 be best simply to be put into a -- just a simple blocked  
24 account, no interest, no additional earning, and that account  
25 simply be debited as payments came in under letters of credit.

The below is the entire transcript pages of 777, and 778, which is also attached as

**Exhibit 2 in globo:**

1           A     Okay, that, that's a little different. And let me  
2 see if I can add any clarity to all this. This is the second  
3 transaction. The funds originated from New York; they came to  
4 Atlanta. They were originally held in an investment account.  
5 They were locked in an investment account. They were used as  
6 cash collateral, cash collateral to fund those letters of  
7 credit we just talked about. Correct?

8           Q     Yes.

9           A     Some of those letters of credit were issued in fact  
10 to Ghana companies.

11          Q     Yes.

12          A     And some of the instructions for payment were to  
13 debit this account and transfer those funds for payment against  
14 invoices originating from Ghana. Is --

15          Q     Okay. Whose permission did you have to get to put  
16 the monies in a -- in those securities? Wasn't that money --  
17 Once the loan was done, Mr. Browning --

18          A     Yes.

19          Q     -- wasn't those monies for the exclusive use of  
20 Quality Grain -- wasn't it -- it was supposed to have been in  
21 an account, but your company was not supposed to trade that  
22 money through any papers, like General Electric, without the  
23 company's permission, the Ghana company; is that correct?

24          A     Well, I think that adds a brand new level of  
25 complexity to it. But I think what -- I think you are correct

Ms. Cotton provides **Transcript page 778**, is the testimony of the Defendants' employee,

William Browning, where he admitted Ms. Cotton told him to close the investment account:

1   that we -- We put this into an investment account with the  
2   intention that as long as it was going to be cash collateral it  
3   should actually be earning some additional money for the  
4   project.

5           Q     Yes.

6           A     And some of the letters of credit actually didn't --  
7   Some of the letters of credit didn't mature until three or four  
8   months down the line. And when you've got \$12 million in an  
9   investment account, your desire is to get several more dollars  
10  of income, because the collateral is being parked.

11               Now, it was upon your instruction, after about three  
12  weeks, because you did not want the funds to remain in the  
13  investment account, because you felt that the -- the very fact  
14  that these were in short-term investments, that there could  
15  have been loss, devaluation loss to those --

16               Although I tried to explain at the time, we issued  
17  the letters of credit -- if we issued letters of credit for  
18  \$100 and those letters of credit were already issued and our  
19  cash collateral diminished, that was going to be the bank's  
20  problem, not yours. Because we were using that -- and we had  
21  put them there in an effort to earn additional funds for you.

22               But you elected after about three weeks that it would  
23  be best simply to be put into a -- just a simple blocked  
24  account, no interest, no additional earning, and that account  
25  simply be debited as payments came in under letters of credit.

23.

The Defendants' employees William Browning and Ramechia Banks closed the first unauthorized investment account that they were using for their benefit and without Ms. Cotton's authorization nor knowledge during the period of August 8, 1997 through August 29, 1997.

24.

Ms. Cotton contends the Defendants employee gave perjured testimony when he stated her \$12-million dollars would be paid back by bank if loss, which contradicts the Account Statement at the bottom of the page showed Ms. Cotton's and her company's \$12 million dollars was subjected to loss and risk, unlike what the Defendants' employee, Browning gave perjured testimony about in the civil action, that if anything happened to the cash collateral or that it diminished, that it would be the banks problem, and not the Company's. The Defendants were not authorized to open the investment account, and buy the General Electric Cap Corp Discount

Commercial Paper shown below:

D A I L Y   A C C O U N T   A C T I V I T Y						
DATE	ACTIVITY	QUANTITY	DESCRIPTION	PRICE	AMOUNT	BALANCE
			OPENING ACCOUNT BALANCE			0.00
			PURCHASES AND SALES			
8/08/97	BUY	11,782,000	GENERAL ELECTRIC CAP CORP DISCOUNT COMMERCIAL PAPER 08/15/97	99.8981111	11,769,995.45DR	
8/15/97	SELL	11,782,000	GENERAL ELECTRIC CAP CORP DISCOUNT COMMERCIAL PAPER 08/15/97	100.0	11,782,000.00CR	
			DEPOSITS AND WITHDRAWALS			
8/08/97	CASH RECEIPT		80-023-531		11,769,995.45CR	
8/15/97	TEFRA WITHHOLD		SLS TEFRA WHD TID		3,652,420.00DR	
8/15/97	JOURNAL ENTRY		REV TEFRA W/H		3,652,420.00CR	
8/15/97	DISBURSEMENT		80-023-531		11,782,000.00DR	
			CLOSING ACCOUNT BALANCE			0.00

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END OF STATEMENT

01368

ACCOUNT CARRIED WITH  
BHC SECURITIES, INC.  
MEMBER NEW YORK STOCK EXCHANGE



25.

The Defendants were not authorized to open the investment account, and buy the **General Electric Cap Corp Discount**

26.

Ms. Cotton contends that the Defendants' employees Browning, Banks and **David Kanne**, closed the first account about three weeks when Ms. Cotton found out about it. However, they knowingly went against Ms. Cotton's, Chief Executive Officer, order to close the Investment account and not open another one, and to just use the loan proceeds to collateralize the Letters of Credit (LCs) and pay them when they came in to the bank, per the loan agreement.

27.

The Defendants' employees opened another investment account unknown to Ms. Cotton, in Ms. Cotton's company's name, and put it to Ms. Cotton's attention again, as if Ms. Cotton authorized it or had knowledge of their scheme to open another investment account. Ms. Cotton emphatically told the Defendants' employees of Browning, Ramechia Banks, and David Kanne, Account Representative, to close the first account, and not to open any others, and to cease and desist from their actions.

28.

The following is **Second** investment account that the Defendants opened **without** Ms. Cotton's knowledge and authorization with a **DIFFERENT** account number of **14610110** from **9/09/97 thru 09/30/97**, where the Defendants still kept Ms. Cotton's balance of **\$8,644,000.00** **in the stock market**, in an unauthorized investment account without Ms. Cotton's knowledge,

and made over \$46,711,287.01 for that period from 9/09/97 thru 09/30/97, where the Defendants were paid cash, received and deposited \$46,711, 287.01, using my company's \$8,644, 000.00, without my knowledge nor authorization and did not pay it to Ms. Cotton:

## SouthTrust Securities

P.O. Box 2554  
BIRMINGHAM, AL 35290

QUALITY GRAIN CO (GHANA) LTD  
ATTN J R WOODARD  
2022 POWERS FERRY RD  
SUITE 180  
ATLANTA GA 30339

PERIOD	PAGE	OFFICE	A/E
09/09/97-09/30/97	1	110	0944
SOC/SEC/TAX ID	ACCT NO		
	14610110		

YOUR REPRESENTATIVE: DAVID P. KANNE

404-853-5604

DUPLICATE STATEMENT FOR THE ACCOUNT OF  
QUALITY GRAIN CO GHANA LTD  
ATTN J R WOODARD  
23 AIRPORT AKOSOMBO ROAD

### ACCOUNT VALUE

DESCRIPTION	MARKET VALUE	% PORTFOLIO
CASH	478.02CR	
MONEY MARKET INSTRUMENTS	8,644,000.00CR	100.0
TOTAL VALUE	8,644,478.02CR	

### EARNINGS SUMMARY

DESCRIPTION	THIS PERIOD	YEAR-TO-DATE

### COMBINED CASH SUMMARY

DESCRIPTION	AMOUNTS PAID	AMOUNTS RECEIVED	BALANCE
BALANCE FROM PREV STATEMENT			.00
AMOUNTS CREDITED DUE TO:			
SALES		19,047,000.00	
DEPOSITS		27,664,287.01	
AMOUNTS PAID DUE TO:			
PURCHASES	27,663,808.99		
CASH WITHDRAWALS	19,047,000.00		
ENDING BALANCE	46,710,808.99	46,711,287.01	478.02CR

### YOUR PORTFOLIO SUMMARY

ACCOUNT TYPE	SYMBOL	QUANTITY	DESCRIPTION	CURRENT PRICE	MARKET VALUE	EST ANNUAL INCOME	EST YLD
			MONEY MARKET INSTRUMENTS				
ASH	GMSP10/01/97	8,644,000	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER 0% 10/01/97	100.000	8,644,000.00		

### DAILY ACCOUNT ACTIVITY

DATE	ACTIVITY	QUANTITY	DESCRIPTION	PRICE	AMOUNT	BALANCE
			OPENING ACCOUNT BALANCE			0.00
			PURCHASES AND SALES			

CONTINUED ON PAGE 2

01363

ACCOUNT CARRIED WITH  
BHC SECURITIES, INC.  
MEMBER NEW YORK STOCK EXCHANGE

SIPC

29.

The Defendants targeted Ms. Cotton and her company because she was a black woman, and they could skip from paying taxes to the IRS on the over \$145-million they made from Ms. Cotton's \$12 million dollars during the four months that they had in the stock market because it was a foreign company.

30.

Ms. Cotton is entitled to all the money that was paid out and earned through both unauthorized investment accounts the Defendants opened without Ms. Cotton's knowledge.

31.

The defendants owe Ms. Cotton the \$145-million dollars plus the annual rate of 12% (twelve percent) interest that the Defendants said would be paid to her when the Defendants opened the first unauthorized investment account, and the money made from their two unauthorized investment accounts shown herein the Defendants opened.

32.

The Defendants have not paid Ms. Cotton any of the over \$145 million (One hundred forty-five million dollars) plus interests and have only sought to cover-up their actions.

33.

Ms. Cotton contends that the Honorable Court, Public and other minority owned businesses or minority owned U.S. citizens, with foreign companies that are account holders at Wells Fargo Bank, or any of the banks like Wachovia and SouthTrust Bank, that the Defendants

bought out and acquired, have no idea whether their company may have been the victim also to have their money invested and money laundered into unauthorized investment accounts, and stolen and had a fake W-9 created, to prevent the Defendants' from paying taxes.

34.

Ms. Cotton contends that if she was a white woman, or white male, she would not be discriminated against, nor had her claim barred due to Fraud on the Court by the Defendants, and only limited it to accounts that were opened for only personal accounts.

35.

Ms. Cotton contends that the Defendants are required to extend the time-frame of the period to include Ms. Cotton's two unauthorized investment accounts opened by the Defendants, and make restitution for the \$145-million dollars earned plus interest from her \$12-million dollars **that the Defendants ran through her company, plus the 12% interest that Browning stated was paid on the two unauthorized investment accounts, the disbursed cash withdrawals paid to the Defendants, without Ms. Cotton's knowledge or authorization.**

36.

The **September 9, 1997 thru September 30, 1997**, Account Statement **14610110**, clearly showed that Ms. Cotton's **\$8,644,478.02 million** was still subjected to loss and used to buy General Motors Acceptance Corp Discount Commercial Paper.



The below is page 2 of 3 of the Account Statement showed how the Defendants  
bought General Motors Acceptance Corp Discount Commercial Paper with Cotton's millions:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

CUSTOMER NAME	PAGE
QUALITY GRAIN CO (GHANA) LTD	2
PERIOD	ACCOUNT NUMBER
09/09/97 - 09/30/97	14610110

## DAILY ACCOUNT ACTIVITY

DATE	ACTIVITY	QUANTITY	DESCRIPTION	PRICE	AMOUNT	BALANCE
9/10/97	BUY	9,669,000	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER 09/17/97	99.9018056	9,659,505.58DR	
9/17/97	BUY	9,378,000	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER 09/24/97	99.9018056	9,368,791.33DR	
9/24/97	BUY	8,644,000	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER 10/01/97	99.9018056	8,635,512.08DR	
DEPOSITS AND WITHDRAWALS						
9/10/97	CASH RECEIPT		80-023-531		3,652,420.00CR	
9/10/97	CASH RECEIPT		80-023-531		6,007,085.58CR	
9/11/97	CASH RECEIPT		80-023-531		281.42CR	
9/17/97	JOURNAL ENTRY		TYPE 4 TO CASH MRG6		9,369,000.00CR	
9/25/97	JOURNAL ENTRY		TYPE 4 TO CASH MRG6		8,635,500.01CR	
ACTIONS AFFECTING YOUR PORTFOLIO						
9/11/97	DELIVERED	9,669,000-	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER CASH TO TYPE 4 MRG6 0% 09/17/97			
9/18/97	DELIVERED	9,378,000-	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER CASH TO TYPE 4 MRG6 0% 09/24/97			
9/25/97	DELIVERED	8,644,000-	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER CASH TO TYPE 4 MRG6 0% 10/01/97			
CLOSING ACCOUNT BALANCE						478.02CR
						0.00
PURCHASES AND SALES						
9/17/97	SELL	9,669,000-	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER 09/17/97	100.0	9,669,000.00CR	
9/24/97	SELL	9,378,000-	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER 09/24/97	100.0	9,378,000.00CR	
DEPOSITS AND WITHDRAWALS						
9/17/97	DISBURSEMENT		60-806-421		300,000.00DR	
9/17/97	JOURNAL ENTRY		TYPE 4 TO CASH MRG6		9,369,000.00DR	
9/24/97	DISBURSEMENT		60-806-421		742,499.99DR	
9/25/97	JOURNAL ENTRY		TYPE 4 TO CASH MRG6		8,635,500.01DR	

CONTINUED ON PAGE 3

ACCOUNT CARRIED WITH  
BHC SECURITIES, INC.  
MEMBER NEW YORK STOCK EXCHANGE

01364



The Defendants betrayed her confidence in her banker. The Account Statement below on Page 3 of 3, showed the Defendants betrayed Ms. Cotton's trust when they bought over \$8.5 million dollars in Discount Commercial paper, with her millions, and subjected it to loss:

CUSTOMER NAME	PAGE
QUALITY GRAIN CO (GHANA) LTD	3
PERIOD	ACCOUNT NUMBER
09/09/97 - 09/30/97	14610110

## DAILY ACCOUNT ACTIVITY

DATE	ACTIVITY	QUANTITY	DESCRIPTION	PRICE	AMOUNT	BALANCE
ACTIONS AFFECTING YOUR PORTFOLIO						
9/11/97	RECEIVED	9,669,000	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER CASH TO TYPE 4 MRG6 0% 09/17/97			
9/18/97	RECEIVED	9,378,000	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER CASH TO TYPE 4 MRG6 0% 09/24/97			
9/25/97	RECEIVED	8,644,000	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER CASH TO TYPE 4 MRG6 0% 10/01/97			
						0.00

## TRADES SETTLING NEXT PERIOD

ACCOUNT TYPE	DATE	ACTIVITY	QUANTITY	SYMBOL	DESCRIPTION	PRICE	AMOUNT
OTHER	10/01/97	SELL	8,644,000-	GMSP10/01/97	GENERAL MOTORS ACCEPTANCE CORP DISCOUNT COMMERCIAL PAPER	100.0	8,644,000.00CR

THESE INVESTMENTS ARE NOT INSURED BY THE FDIC; THEY ARE NOT A DEPOSIT OR OBLIGATION OF, ENDORSED BY, OR GUARANTEED IN ANY WAY BY ANY BANK OR ANY BANK SUBSIDIARY; AND THEY ARE SUBJECT TO INVESTMENT RISK, INCLUDING THE POSSIBLE LOSS OF THE PRINCIPAL AMOUNT INVESTED.

END OF STATEMENT

01365

ACCOUNT CARRIED WITH  
BHC SECURITIES, INC.  
MEMBER NEW YORK STOCK EXCHANGE

STP